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October 17, 2002

Mary L. Cottrell, Secretary Department of Telecommunications and Energy One South Station Boston, MA 02110

Re: NSTAR Gas Company, D.T.E. 02-12

Dear Secretary Cottrell:

Enclosed for filing, please find NSTAR Gas Company's responses to Record Requests AG-1, AG-2, AG-3, AG-4, DTE-1 and DTE-2. The response to RR AG-3 includes confidential and competitively sensitive information, which is the subject of a Company Motion for Protective Treatment, filed with the Department today under separate cover.

Thank you for your attention to this filing.

Sincerely,

Stephen H. August

Encl.

cc: Denise Desautels, Hearing Officer

Carol R. Wasserman, Esq. Wilner Borgella, Jr. Esq.

NSTAR Gas Company
D.T.E. 02-12
Department of Telecommunications and Energy
Record Request: AG-1
Person Responsible: Barbara Stamos
October 17, 2002

Record Request: AG-1

Please provide an analysis demonstrating any savings associated with the conversion of two Tennessee Gas Pipeline contracts from the NET rate schedule to the FT-A rate schedule.

Response

Please refer to the attached worksheet, in which the current NET rates and the proposed FT-A rates are compared for each contract. For the first five years after the conversion, the Company will be paying a surcharge on the FT-A rate in order to partially compensate Tennessee Gas Pipeline for foregone revenue. However, for each contract the FT-A rate plus the surcharge is lower than each contract's applicable NET rate. After five years, the surcharges will be eliminated and the Company will be charged the tariff FT-A rate. The Company estimates that a total of \$9.8 million in transportation charges will be saved over the terms of both contracts.

In addition to the financial benefits associated with conversion, the Company will benefit from the secondary point access and capacity release ability available under rate schedule FT-A. No other provisions of the two existing service agreements, including termination dates or maximum daily quantities, have changed. The Company intends to submit the contracts for approval from the Department.

NSTAR Gas Company RR-AG-1

Service Provider:

Tennessee Gas Pipeline

Contract Information:		
NET K#	14688	33370
Segments	1,2,3,4	3,4
Zones	5-6	5-6
MDQ	9,600	4,500
Term	2012	2011
Rates:		
NET Demand Rate	\$19.12	\$10.61
NET Fuel %	1.82%	1.22%
FTA Demand	\$4.93	\$4.93
FTA Commodity Rate	\$0.0765	\$0.0765
FTA Fuel %	1.96%	1.96%
Load Factor	80%	100%
Gas Cost	\$4.45	\$4.45
TGP Annual Revenue:		
NET Demand Revenue	\$2,202,624	\$572,940
NET Fuel	\$231,240	\$90,273
NET Total	\$2,433,864	\$663,213
FTA Demand Revenue	\$567,936	\$266,220
FTA Commodity Revenue	\$214,445	\$125,651
FTA Fuel	\$249,383	\$146,123
FTA Total	\$1,031,764	\$537,994
Annual Difference:		
Demand	\$1,634,688	\$306,720
Commodity	(\$214,445)	(\$125,651)
Fuel	(\$18,143)	(\$55,850)
Total	\$1,402,100	\$125,219
FT-A Surcharge Calculation		
Yr 1-2: Annual Diff x .8125	\$1,139,206	\$101,740
Yr 3-5: Annual Diff x .625	\$876,312	\$78,262
Estimated Savings		
Years 1-2	\$525,787	\$46,957
Years 3-5	\$1,577,362	\$140,871
Years 6 - End of Term	\$7,010,500	\$500,874
Total Conversion Savings	\$9,113,649	\$688,702

NSTAR Gas Company
D.T.E. 02-12
Department of Telecommunications and Energy
Record Request: AG-2
Person Responsible: Barbara Stamos

October 17, 2002

Record Request: AG-2

Please provide a signed and dated copy of the supply agreement to be implemented on November 1, 2002.

Response

In light of recent financial difficulties currently being experienced by the energy trading business sector, the Company sought to protect its customers by requiring certain financial safeguards as part of the negotiation process for a one-year asset management agreement. Because the potential asset manager was not able to provide sufficient financial safeguards (*i.e.*, certain important creditworthiness provisions), the Company has terminated its effort to finalize an asset management agreement for the coming heating season. As a result, the Company has elected manage its portfolio internally, securing firm gas supplies for the 2002 - 2003 winter season without the use of an asset manager.

NSTAR Gas Company
D.T.E. 02-12
Department of Telecommunications and Energy
Record Request: AG-4
Person Responsible: Barbara Stamos
October 16, 2002

Record Request AG-4

Please identify how the Company recovers the cost of gas used by the Company. How is the cost of unaccounted-for gas recovered in rates?

Response

The Company recovers the cost of gas it purchases through its semiannual cost of gas adjustment charge, as set forth in the Company's Seasonal Cost of Gas Adjustment Clause Tariff M.D.T.E. 286. This is a fully reconciling gas cost recovery mechanism. The cost of Company-use gas as well as unaccounted-for gas is included in the total gas costs recovered through the CGAC.

NSTAR Gas Company
D.T.E. 02-12
Department of Telecommunications and Energy
Record Request: DTE-2
Person Responsible: Barbara Stamos
October 16, 2002

Record Request DTE-2

Please provide the RFPs that were issued by the Company which resulted in asset-management agreements.

Response

Please refer to the attached RFPs.

NSTAR GAS

REQUEST FOR PROPOSALS FOR SUMMER SEASON GAS REQUIREMENTS AND STORAGE REFILL

NSTAR GAS (formerly Commonwealth Gas), is a local gas distribution company (LDC) which provides service to approximately 240,000 natural gas customers in four geographic areas in the vicinities of the cities of Worcester, New Bedford, Cambridge and Framingham, Massachusetts. NSTAR Gas (the Company) currently has under contract 7.579 BCF of storage directly or indirectly connected to Texas Eastern Transmission System and Tennessee Gas Pipeline. The Company also has approximately 3.6 BCF of LNG to satisfy its winter swing and peaking supply needs. The Company has firm transportation with an MDQ of 130,170 Dth/day from Tennessee and Texas Eastern production areas to storage and market area delivery points.

A. OBJECTIVE OF RFP

NSTAR Gas is seeking a supplier(s) to fill and manage up to 5 BCF of its market area storage. **Exhibit A** lists NSTAR Gas' storage contract entitlements as well as upstream transportation available for deliveries to the storage locations. The Company anticipates releasing transportation and storage capacity to the potential supplier(s) for a seven-month period beginning on April 1, 2001. The capacity will be released at maximum rates and the potential supplier(s) will in turn bill the Company back for the transportation costs associated with deliveries into the Company's storage accounts. Although the tables represent over 7.5 BCF of capacity, NSTAR Gas will select the most attractive bid for a total of 4 to 5 BCF of storage capacity. All of the storages are located in market areas accessible to Tennessee and Texas Eastern pipelines.

The Company would also consider purchasing a city-gate supply for up to 30,000 Dth/day of its requirements on Tennessee and/or Algonquin. The Company would be willing to release upstream capacity on either or both pipelines in order to facilitate citygate deliveries.

The Company desires to have an executed contract by March 28, 2001, with service commencing on April 1, 2001. If any party would like a copy of the Company's standard gas purchase contract, please indicate this in the proposal. Any individual interested in submitting a proposal to NSTAR Gas must include the following information:

- ♦ Explain the methods that will be used to manage the storage contracts or gas deliveries, including utilization of financial and physical markets.
- Explain the pricing methodology that you would propose to use. For example,

identify whether any payments for use of the assets would be in a lump sum or perhaps reflected in a discount to applicable indices.

- Identify any and all opportunities that you may envision that NSTAR Gas may capture by entering into a summer storage fill program or gas purchase deal.
- ♦ Include a register of references including contact names and telephone numbers that the Company may contact with respect to other asset-management agreements executed by your company from 1998 through 2001.

B. CONTRACT TERM

The contract length acceptable to NSTAR Gas will be seven months (April - October) with an expiration date of October 31, 2001. The Company will not entertain proposals with a term longer than seven months.

C. PRICING

NSTAR Gas is open to various pricing structures and will consider proposals that present alternative pricing approaches; however, each proposal should clearly indicate the preferred pricing methodology. (During the past several seasons, the Company has elected to utilize a discounted index pricing structure.) NSTAR Gas offers the following guidelines in setting the pricing methodology:

- Supplier will provide NSTAR Gas with a fixed discount to the Inside FERC monthly price index for all gas supply delivered into storage. Please state discount to Index.
- ♦ The proposal may include a total up-front savings NSTAR Gas will capture regardless of what occurs during the summer season. *Please state total dollars to be realized.*
- Supplier will provide NSTAR Gas with a certain minimum discount to the Inside FERC monthly price index and a fixed margin sharing mechanism. Please state discount to Index and proposed sharing percentages.

D. <u>ADDITIONAL PROPOSALS AND VARIATIONS</u>

The Company is always interested in opportunities which would enable it to maximize the value of its assets and reduce its costs to its customers. Suppliers may observe a way to utilize NSTAR Gas' storage or transportation assets more effectively, or to capture advantageous price swings in the marketplace. Please include any proposals that may differ from the pricing format mentioned in Section C.

E. PROCEDURES

Responses to this RFP must be made in writing and may be made by mail, enclosed in a sealed envelope, or by telecopy. All proposals must be received by February 14, 2001at 4:00 p.m. EST. Any supplier that submits a telecopy response to this RFP must also send its response by mail, enclosed in a sealed envelope and postmarked no later than February 14, 2001.

All proposals should be sent to:

Barbara W. Stamos NSTAR Gas Company 157 Cordaville Road Southborough, MA 01772 Telecopier: (508) 481-0934

Telephone: (508) 481-7900 x2163

Exhibit A

STORAGE AVAILABLE FOR SUMMER FILL SUMMARY: TETCO / ALGONQUIN STORAGE SERVICES

OPERATOR	STORAGE CONTRACT	TOTAL CAPACITY (Dth)	ESTIMATED INVENTORY 4/1/01 (Dth)	MAX W/D (Dth/day)	MAX INJ (Dth/day)
TETCO	SS 400145	610,599	70,000	5,170	3,139
TETCO	SS 400146	404,670	60,000	5,781	2,080
TETCO	SS 400147	1,916,400	200,000	31,940	9,851
TETCO	SS 412007	22,820	1,500	326	117
TETCO	FSS-1 400506	80,520	5,000	1,342	414
DTI	GSS 600005	1,064,618	120,000	11,008	5,915

TRANSPORTATION FOR TEXAS EASTERN/DTI STORAGE INJECTIONS

Storage	Delivery Meter	Receipt Meter	Storage Meter	Notes
SS,FSS-1,SS-1	TETCO SS-1 79513	TETCO SS-1 79513	TETCO Storage Inj 79515	60%/40% M2/M3 split
DTI GSS	TETCO Oakford 75082	DTI Oakford 40208	DTI GSS Stor Inj 10001	

STORAGE AVAILABLE FOR SUMMER FILL

SUMMARY: TENNESSEE STORAGE SERVICES

OPERATOR	STORAGE	STORAGE CAPACITY (Dth)		MAX W/D (Dth/day)	MAX INJ (Dth/day)	
TENNESSEE	FSMA	1,255,060	150,000	20,777	8,367	
DTI	GSS	929,434	90,000	8,449	5,164	
STEUBEN	STEUBEN	1,250,000	210,000	11,364	8,929	

TRANSPORTATION FOR TENNESSEE INJECTIONS

Storage	Delivery Meter	Receipt Meter	Storage Meter	Notes
TGP FSMA	TGP ISS Storage 060018	TGP ISS Storage 060018	TGP ISS Storage 060018	
DTI GSS	Ellisburg Inj TGP 060012	CNG Ellisburg 40107	CNG GSS Storage 10001	
Steuben	Ellisburg Inj TGP 060012	CNG Ellisburg 40107	Steuben Sto CNG 90005	CNG Trans. Contract 200039

Firm Upstream Transportation

astern Transmission Company - Net Aggregate 82,789	
South Texas – Maximum	18,556
East Louisiana - Maximum	18,860
East Louisiana (Monroe Lateral) - Maximum	5,000
M1 – 24" Maximum	1,405
M1 – 30" Maximum	10,889
West Louisiana - Maximum	17,657
East Texas - Maximum	10,422
Tennessee Gas Pipeline - Net Aggregate	47,381
500 Leg – Maximum	26,451
800 Leg - Maximum	7,851
100 Leg - Maximum	13,085

March 5, 1999

<name>
<company>
<address1>
<address2>
<city>, <state> <zip>

Dear <name>:

Commonwealth Gas Company is seeking firm gas supplies and asset management of its transportation, storage and existing supply portfolio during the time period of April 1999 through October 1999. The Company has selected you and a limited number of other potential suppliers to be specifically invited to submit a quote for providing firm gas supplies to meet our requirements.

The Company's requirements during this period would encompass the following:

- Delivered gas at the Company's Algonquin and Tennessee citygates to meet its firm sendout requirements;
- Gas deliveries of up to 15,000 Dth/day at the Company's Hopkinton citygate, which will be liquefied and stored in the Company's LNG facility. (Such deliveries are dependent on operational considerations and cannot be ratably scheduled);
- 3. Gas deliveries to the Company's contracted storage facilities including Texas Eastern Transmission Company, Tennessee Gas Pipeline, Consolidated Natural Gas and Steuben Storage, such that the inventory levels at the facilities are at a 95% full level on November 1, 1999. Inventory levels specified in the attachments on March 31, 1999 are estimates only and are subject to change due to weather conditions.

In order to facilitate the aforementioned gas deliveries, the Company anticipates releasing its upstream pipeline and storage capacity for the applicable time period at maximum tariff rates. Please note that no capacity will be assigned to migrating customers. The Company will subsequently reimburse the Successful bidder(s) for the demand charges paid. Other variable pipeline charges (commodity, ACA, GRI, etc.) will be subject to reimbursement only according to company usage. Commodity charges are expected to be market

priced, preferably employing published indices as the pricing mechanism

In order to assist in your analysis of potential optimization opportunities, the Company has attached the following information:

- 1. Lists of the Company's firm transportation contracts, including receipt and delivery point information and maximum daily quantities;
- 2. Charts listing the Company's storage contracts, including maximum daily injection quantities, estimated inventory levels, and refill requirements;
- 3. A description of the Company's LNG refill requirements; and
- 4. Firm Sendout from April 1996 through October 1998;
- 5. The Company's expected citygate demand requirements from April through October 1999.

The Company would be interested in receiving several pricing alternatives in proposals received, such as a lump sum payment for excess capacity or a discount to index methodology. Three different portfolio scenarios may be bid upon including:

- 1. A proposal for Texas Eastern and Algonquin capacity, storage and supply
- 2. A proposal for Tennessee capacity, storage and supply
- 3. The whole portfolio.

Due to the fact that a deal must be completed relatively expeditiously, proposals must be faxed to me by March 15, 1999.

If you have any questions, I may be reached at (508) 481-7900 extension 2906 or by Fax at (508) 481-0934.

We look forward to receiving your response.

Sincerely,

Joanna M. Gaba Senior Forecast Analyst

COMMONWEALTH GAS COMPANY

REQUEST FOR PROPOSALS FOR THE PURCHASE OF LONG TERM NATURAL GAS SUPPLIES/STORAGE OPTIMIZATION

COMMONWEALTH GAS COMPANY (COM/Gas, or the Company), is a local gas distribution company (LDC) which provides service to approximately 239,000 natural gas customers in four geographic areas in the vicinities of Worcester, New Bedford, Cambridge and Framingham, Massachusetts. The Company's total load in 1999 was approximately 48 Bcf, of which approximately 34 Bcf, or 75%, served residential and small commercial customers. COM/Gas is subject to regulation by the Massachusetts Department of Telecommunications and Energy (Mass DTE). While the DTE has not issued a final order approving the Company's recently filed transportation tariff, it is expected that, no later than November 1, 2000, COM/Gas will begin assigning, on a mandatory basis, pro-rata shares of upstream (transportation and storage) and downstream (LNG) capacity to customers who have migrated or will migrate from firm sales service to firm transportation service.

A. OBJECTIVE OF RFP

In 1999, COM/Gas entered into firm winter gas supply contracts with Gulf Coast area suppliers for 97% of its domestic longhaul firm transportation capacity. All contracts expired on March 31, 2000. The Company is seeking to enter into a five month firm gas supply agreements that will replace the expired agreements. It is anticipated that the new agreements will commence on November 1, 2000 and terminate on March 31, 2001.

The Company currently has under contract 7.54 Bcf of storage on the Texas Eastern/Algonquin System and Tennessee Gas Pipeline System. The Company also has approximately 3.6 Bcf of LNG to satisfy its swing and peaking supply needs. In November 1999 the Company selected an asset manager to optimize 3.2 Bcf of its upstream storage entitlements and associated pipeline transportation for the winter season. The Company would consider entering into a similar arrangement in November 2000.

COM/Gas desires to secure replacement firm gas supplies to meet the Company's firm demand requirements. In structuring its gas supply portfolio, COM/Gas seeks reliable gas supplies at the lowest practicable costs. COM/Gas also seeks to optimize its storage to enable the Company to lower its cost of gas. This Request for Proposals (RFP) explains the specific requirements of the replacement supplies that the Company seeks to procure and outlines COM/Gas' storage management needs. It also outlines the procedural requirements a proposal must meet in order to qualify for consideration. *Potential suppliers are cautioned to carefully read this RFP*.

Selected parties must execute contracts to provide firm gas supplies or storage management services to COM/Gas by October 2000, for service commencing November 1, 2000. The contract form will be prepared by the Company and will be offered to bidders who are selected by the Company for final negotiations. All contracts may be filed with the Massachusetts DTE for informational purposes.

B. SYSTEM DESCRIPTION

Gas is delivered to the COM/Gas distribution system through two pipelines: Algonquin Gas Transmission Company (AGT) and Tennessee Gas Pipeline Company (TGP). Gas is delivered to COM/Gas on AGT via Texas Eastern Transmission Company (TETCO), Texas Gas, and Consolidated Natural Gas (CNGT). Gas is delivered on TGP directly and via Iroquois Pipeline.

COM/Gas also has nine market area storage contracts at several facilities that serve as supplemental winter supplies. In addition, COM/Gas utilizes two Company-owned liquefied natural gas (LNG) facilities for winter peaking purposes.

COM/Gas has the ability to interchange volumes of gas between the portion of its distribution system served primarily by AGT and the portion served primarily by TGP. This capability allows the Company certain flexibility in managing purchases from either system.

The Company has implemented programs to improve the overall purchased gas load factor on both the TGP and AGT/TETCO systems through marketing programs to extend and increase sales to non-core customers during non-heating and shoulder periods. The Company's success with these initiatives will be directly influenced by the pricing and other terms of its supply contracts.

C. SUPPLY REQUIREMENTS

COM/Gas requires a supply of up to **82,789 Dth/day** for delivery into Texas Eastern, and up to **47,386 Dth/day** for delivery into TGP. **Exhibit 1** shows the production area locations in which COM/Gas has available firm transportation to receive these supplies. COM/Gas is also looking for **10,132 Dth/day** of delivered Algonquin supply utilizing the Texas Gas, TETCO, CNG and AGT capacity that was formerly associated with Algonquin's F-2 service. **Exhibit 2** shows this capacity and its associated receipt point entitlements.

With the exception of the F-2 capacity, all of the Company's upstream entitlements will be subject to the Company's mandatory capacity assignment program.

COM/Gas prefers to consider proposals that provide a minimum of **5,000 Dth/day** as the Daily Contract Delivery Volume (DCDV).

COM/Gas will consider proposals directly associated with a specific wellhead or gas field delivery point if the expected and guaranteed production by month is clearly specified and documented. The Company will also consider proposals with a pooling point as the designated delivery point. All transportation utilized upstream of the proposed delivery point(s) must be firm.

D. STORAGE REQUIREMENTS

COM/Gas is seeking a supplier(s) to manage up to 5 BCF of its market area storage. **Exhibit 4** lists all of Commonwealth Gas storage entitlements and associated transportation capacity. Although the tables represent over 7.5 BCF of capacity, Commonwealth Gas will select the most attractive bid for up to 5 BCF of storage capacity. Each storage facility will be reviewed separately; therefore, you need not bid on all storage facilities. All of the storages are located in the market area accessible to the Tennessee and Texas Eastern/Algonquin systems. Any storage proposals should be exclusive of supply requirements and should be presented as a separate bid.

- Explain the methods that will be used to manage the storage contracts including utilizing both the financial market and the physical market.
- Identify any and all financial benefits to COM/Gas that may be obtained through a storage management agreement.
- Please note that any storage management agreement will be subject to the system supply requirements of COM/Gas' firm sales customers. Furthermore, any such arrangements will need to maintain a degree of flexibility in order to facilitate storage assignment to transportation customers under COM/Gas' mandatory capacity assignment program. Two of the storage contracts, CNG contract 600005 at Oakford and Steuben Storage, will be "virtually assigned" and not physically released due to the fact that certain contracts associated with these storages are under section 7 (c) and cannot be released.

E. <u>CONTRACT TERM</u>

The maximum contract length for supply and storage acceptable to COM/Gas will be five months, with an expiration date of March 31, 2001.

F. PRICING

COM/Gas operates in an increasingly competitive market, so suppliers are encouraged to present pricing approaches that are responsive to competitive conditions. COM/Gas is open to various pricing structures and will consider proposals that present alternative pricing approaches; however, each proposal should clearly indicate the preferred pricing methodology. COM/Gas offers the following guidelines in setting pricing methodology:

- Pricing proposals should contain a reasonable and supportable mechanism for establishing the price. It also should clearly explain how the pricing mechanism would be implemented.
- The Company is very interested in capacity sharing arrangements that could improve the utilization of the Company's firm pipeline transportation or storage capacity, maximize load factors, and assist in lowering overall costs. In 1999, the Company received 75,000 Dth/d of delivered supply at its citygate and released 75,000 Dth/d of transportation on Texas Eastern, Tennessee, and Algonquin associated with the delivered supply. Please include a delivered supply option in the proposal and include a pricing option showing a discount to the specific supply area indices related to the released transportation.
- Because of the significantly large amount of gas supply solicited in this RFP, the Company is interested in any vendor that can provide volume discounts.
- The storage proposal must include the total up-front savings that COM/Gas will
 capture regardless of what occurs during the winter season. This proposal may only
 include margin sharing in addition to the required up-front payment. Please state
 total dollars to be realized.

G. <u>FLEXIBILITY</u>

To effectively operate its system and meet the requirements of its sales and transportation customers, the Company requires operational flexibility in monthly, daily nominations and actual receipts. The Company currently has contracts that provide the following types of flexibility:

- Monthly Flexibility Monthly flexibility allows monthly nomination variances within predetermined percentages of the DCDV. Generally, these volumes will flow subsequently as a baseload supply for that month, i.e., the first of the month nominated quantity will be the daily quantity for the entire month.
- <u>Intramonth Flexibility</u> Having nominated a monthly quantity of gas, intramonth flexibility allows some number of nomination changes within the month as

determined by a monthly take requirement or a daily allowable variance based on a predetermined percentage of the DCDV. The Company is seeking proposals with different flexibility provisions. The Company will evaluate the proposals against its needs and the relative cost of the flexibility to determine its acceptance of the proposal.

Temperature variations and other planned and unplanned events that could occur within the COM/Gas system, on the interstate pipeline system, or elsewhere, make it desirable to have purchase flexibility to increase or decrease purchases relative to the DCDV or to make-up for quantities that COM/Gas was not able to take in a given period. Therefore, suppliers are encouraged to identify and include flexible nomination and make-up provisions.

H. <u>ADDITIONAL PROPOSALS AND VARIATIONS</u>

Each supplier may submit alternate proposals. The Company is interested in new and innovative ideas. Suppliers may observe a way to utilize COM/Gas storage facilities more effectively, use its transportation capacity more efficiently, or capture price swings in the marketplace. Unless a supplier expressly states otherwise, each proposal will be considered separately, and COM/Gas reserves the right to select one or more individual proposals from a supplier for final contract negotiations.

I. <u>REQUIREMENTS</u>

Each proposal is required to address all of the following:

- 1. Quantity: The proposal must specify the DCDV. See Section C., "Supply Requirements."
- 2. <u>Point(s) of Delivery:</u> The proposal must state the proposed delivery point(s). The proposal must identify the appropriate production area and gas transmission line relating to the proposed delivery point. The proposal should indicate if the gas can be delivered to either the AGT/TETCO or TGP systems.
- 3. <u>Contract Term</u> See Section D., "Contract Term."
- 4. Pricing See Section E., "Pricing."

- 5. Flexibility See Section F. "Flexibility."
- 6. <u>Financial Reports:</u> Each supplier must provide a copy of the company's most recent audited financial statements and annual report. Where another company has any financial interest in the proposed supplier, the most recent audited financial statements and annual report of the company with such financial interest also must be provided.
- 7. Supply and Transportation Documentation and Warranties: Each supplier should provide detailed documentation of the amount of gas supplies that it owns or controls, which are accessible to the applicable delivery points. Each supplier should also provide specific information regarding the status and nature of any upstream transportation that may be used to transport the proposed supplies to designated delivery points. Additionally, it is important to include any information regarding storage capacity your company may own or lease in the market area or the supply area. Finally, potential suppliers will be required to provide warranties in support of a contractual commitment.

J. PROCEDURES

Questions regarding this RFP should be directed to:

Barbara W. Stamos Commonwealth Gas Company 157 Cordaville Road Southboro, MA 01772 (508) 481-7900 x 2163 Telecopier:(508) 481-0934

Email: barbara stamos@nstaronline.com

COM/Gas reserves the right to answer such questions in writing and to distribute its responses to such questions to all parties that have received a copy of this RFP.

Responses to this RFP must be made in writing and may be made by mail, enclosed in a sealed envelope, or by telecopy. All proposals must be received by July 12, 2000 at 4:00 p.m. EST. Any supplier that submits a telecopy response to this RFP must also send its response by mail, enclosed in a sealed envelope and postmarked no later than July 12, 2000. COM/Gas will not accept by mail any proposal from a supplier sent as a follow up to its telefax proposal that differs from its telefax proposal.

All proposals should be sent to:

Barbara W. Stamos Commonwealth Gas Company 157 Cordaville Road Southborough, MA 01772 Telecopier:(508) 481-0934

COM/Gas reserves the right to reject any proposal that is not timely and properly submitted, or is not complete in all respects, or that contains inaccurate or misleading information. The bidder shall be obligated (following the submission of a proposal) to provide further information as the Company may request, and to update any information (including, without limitation, information regarding the bidder's gas, gas transportation and financial resources) such that all information set forth in a bid remains accurate throughout the course of negotiations.

K. PROPOSED SCHEDULE

The following is a proposed schedule (subject to change) for COM/Gas' current RFP process:

Issuance of RFP

Proposals Due

Review of Proposals

First Cut of Suppliers Notified
Individual Conferences with First

June 21, 2000

July 12, 2000

July 13 - July 21, 2000

July 24, 2000

Cut Suppliers July 31 – August 11, 2000

Selection of Final Suppliers August 25, 2000
Contract Negotiations September 2000
Contracts Finalized or Interim

Agreements in Place October 2000

L. <u>CONFIDENTIALITY</u>

Potential suppliers may request that specific information contained in or relative to its proposal be treated by COM/Gas on a confidential basis. Such request shall be clearly stated on every page of the proposal on which confidential information may appear. COM/Gas and its representatives shall take reasonable and best efforts steps to protect information that is clearly identified as confidential from disclosure to third parties.

Potential suppliers should understand that COM/Gas may deem it necessary to disclose certain information relating to this RFP and the proposals it receives to the Mass DTE. Upon written request by a potential supplier, COM/Gas shall request of the Mass DTE that any information designated as confidential by the potential supplier be afforded protected status by the Mass DTE and thus be given confidential treatment by the Mass DTE in any public forum that may be called to evaluate the contracts.

However, COM/Gas cannot guarantee that such information will not be disclosed, and in no event shall COM/Gas be liable for damage as a result of any disclosure of confidential information during the period of review and analysis of proposals or during subsequent contract negotiations and regulatory proceedings.

M. **EVALUATION OF PROPOSALS**

COM/Gas uses several factors in its consideration of firm gas supply proposals. **Exhibit 4** shows the factors and relative weights that COM/Gas will use in its evaluation of proposals. COM/Gas reserves the right to change the factors and their respective weights, and to add or delete factors, at any time. A brief description of the factors follows:

Reliability

COM/Gas defines reliability as the ability to deliver the firm gas supply each day of the contract period. COM/Gas will assess the supplier's ability to meet this commitment as demonstrated by production area capability, deliverability, warranty provisions and past performance. The Company also may consider how the proposal fits into the overall reliability of its supply portfolio.

Competitiveness

COM/Gas operates increasingly in a competitive market, and, therefore, the maximum benefit of the trade-offs between pricing, flexibility, contract term length and reliability will be considered.

Diversity

The Company strives to diversify its supply sources geographically and to utilize different gathering systems (or have access via an alternate system), delivery points, and pipelines and pipeline segments. In this respect, COM/Gas will consider proposals that represent different production areas, and different gathering systems and/or network locations and access. For example, an ability to deliver to both AGT/TETCO and TGP may be an important diversity consideration. However, the supplies must be deliverable into the primary receipt points specified in Exhibit 1.

Responsiveness

COM/Gas will assess how well the proposal meets the requirements of this RFP.

Financial Strength

COM/Gas will review the historical and projected financial resources of the proposed supplier with regard to the competency to act as a long-term natural gas supplier and the capability to meet all future commitments.

N. FIRM COMMITMENT

COM/Gas shall not be considered to have made a commitment to purchase gas from any potential supplier either through the issuance of this RFP or by its negotiations with a potential supplier. COM/Gas reserves the right, in its sole discretion and at any time (including without limitation as the Company deems necessary to comply with the actions of regulatory bodies of competent jurisdiction), to withdraw and/or modify this RFP, to reject any and all proposals, and to discontinue negotiations with any and all potential suppliers. COM/Gas shall have no commitment to purchase gas unless and until the authorized representatives of the Company and the supplier have executed an agreement and any conditions precedent set forth in that agreement have been satisfied. COM/Gas further reserves the right to purchase natural gas supplies from other appropriate sources.

Exhibit 1 Maximum Daily Transportation (Dth/day at Citygate)

exas Eastern Transmission Company - Net Aggregate	82,789
South Texas – Maximum	18,556
East Louisiana - Maximum	18,860
East Louisiana (Monroe Lateral) - Maximum	5,000
M1 – 24" Maximum	1,405
M1 – 30" Maximum	10,889
West Louisiana - Maximum	17,657
East Texas - Maximum	10,422
Tennessee Gas Pipeline - Net Aggregate	47,381
500 Leg – Maximum	26,451
800 Leg - Maximum	7,851
100 Leg - Maximum	13,085

Exhibit 2

Former F2 Capacity Delivered Supply Needed

Transporter	Contract Number	Rate Schedule	Part 284 or 7C	Receipt Point(s)	Receipt Point Entitlement	Delivery Points	Delivery Point MDQ
Texas Gas	4853	FT	284	N. LA Leg East Leg SE Leg South Leg SW Leg West Leg WC 294 Hios	435 50 845 295 544 0 70 204	Lebanon	1,802
Texas Eastern	800351	FT-1	284	WLA Zone ELA Zone STX Zone ETX Zone Kosciusco	865 2,769 1,287 862 1,024	Oakford	4,781
Texas Eastern	330842	FTS	7C	Leidy	10,380	Lambert ville	10,380
CNG	100017	FT	284	Lebanon Broad Run Oakford	1,802 4,039 4,781	Leidy	10,380
Algonquin	93204	AFT-1	284	Lambertville	10,380	COMGas Citygate	10,380

EXHIBIT 3

STORAGES AVAILABLE FOR WINTER OPTIMIZATION

SUMMARY: TETCO / ALGONQUIN STORAGE SERVICES

OPERATOR	STORAGE	CAPACITY (Dth)	MAX W/D (Dth)	MAX INJ (Dth)
TETCO	SS 400145	610,599	5,170	3,139
TETCO	SS 400146	404,670	5,781	2,080
TETCO	SS 400147	1,916,400	31,940	9,851
TETCO	SS 412007	22,820	326	117
TETCO	FSS-1 400506	80,520	1,342	414
CNG	GSS 600005	1,064,618	11,008	5,917

Note: Storage Withdrawal entitlements are subject to pipeline operating restrictions.

STORAGE MDQ RATCHETS

Storage	TETCO SS	400145	TETCO SS	400146	TETCO SS	400147	CNG GSS	600005
Ratchet	INV %	MDW (Dth)	INV %	MDW (Dth)	INV %	MDW (Dth)	INV %	MDW (Dth)
1	<20%	4,308	<20%	4,817	<20%	26,616	< 35%	10,127
2	<10%	2,585	<10%	2,891	<10%	15,970	< 16%	7,705
3							< 10%	6,935

TRANSPORTATION FOR ALGONQUIN STORAGE WITHDRAWAL

	•				
STORAGE	OPERATOR	CONTRACT#	RECEIPT PT.	DELIVERY PT.	MDQ (Dth)
SS 400145	TETCO	SS 400145	SERVICE PT. 79515	Lambertville 79822	5,170
·	AGT	AFT-1 93004ec	Lambertville 00210	CITYGATE	5,113
SS 400146	TETCO	SS 400146	SERVICE PT. 79515	Lambertville 79822	5,781
	AGT	AFT-1 93004ec	Lambertville 00210	CITYGATE	5,717
SS 400147	ТЕТСО	SS 400147	SERVICE PT. 79515	Lambertville 79822	31,940
	AGT	AFT-1 93004ec	Lambertville 00210	CITYGATE	31,585
SS 412007	TETCO	SS 412007	SERVICE PT. 79515	Lambertville 79822	326
	AGT	AFT-1 93004ec	Lambertville 00210	CITYGATE	322
FSS-1 400506	TETCO	FSS-1 400506	SERVICE PT. 79515	STORAGE PT. 79513	1,342
	TETCO	CDS 800290	STORAGE PT. 79513	Lambertville 79822	1,327
	AGT	AFT-1 93004ec	LAMB 00210	CITYGATE	1,312
GSS TE 600005	CNGT	GSS TE 600005	GSS STORAGE 10001	OAKFORD 40208	11,008
	TETCO	FTS-7 331701 FTS-7 331723 FTS-8 331820	OAK FORD 75082	Lambertville 79822	6,267 266 4,277
	AGT	AFT-1 9B102 AFT-1 93303	Lambertville 00210	CITYGATE	6,266 3,820

ALL STORAGE SHOULD BE NOMINATED 24 HOURS BEFORE GAS FLOW IS REQUIRED TRANSPORTATION FOR STORAGE IS AVAILABLE ON A BEST EFFORT NO-NOTICE BASIS

STORAGES AVAILABLE FOR WINTER OPTIMIZATION

SUMMARY: TENNESSEE STORAGE SERVICES

OPERATOR	STORAGE	CAPACITY (Dth)	MAX W/D (Dth)	MAX INJ (Dth)	Days @ Max MDQ
TENNESSEE	FS	1,255,060	20,777	8,367	60
CNG	GSS	929,434	8,449	4,343	72
STEUBEN	STEUBEN	1,295,000	11,364	8,929	85

STORAGE MINIMUM INVENTORY

GSS 300057	% REQUIRED	BALANCE REQUIRED (Dth)	MONTHLY DELIVERY OBLIGATION (Dth) (87.5% MDQ*DAYS)
DECEMBER	35%	325,602	229,179
JANUARY	35%	325,302	229,179
FEBRUARY	15%	139,415	207,001
MARCH			229,179
APRIL 15 REQUIRED USE	604,133		

STORAGE MDQ RATCHET

Storage	GSS	300057	FS	526	STEUBEN	
Ratchet	INV %	MDW (Dth)	INV %	MDW (Dth)	INV %	MDW (Dth)
1	< 35%	7,773	30-100%	20,777	< 25%	9,091
2	< 16%	5,914	20-30%	19,098	< 15%	6,818

3	< 10%	5,323	0-20%	9,648	< 5%	5,114

TRANSPORTATION FOR TENNESSEE STORAGE WITHDRAWAL

STORAGE	OPERATOR	CONTRACT / CONTRACT #	RECEIPT POINT	DELIVERY POINT	MDQ (Dth)
FS 526	TENNESSEE	FS 526	TGP ISS Storage	Ellisburg (TGP) 070018 (Z4)	9,439
	TENNESSEE	FT-A 2376	Ellisburg 070018	Worcester 020109 (Z6)	9,439
GSS 300057	CNGT	GSS 300057	GSS Storage 10001	Ellisburg (CNG) 40107 (Z4)	8,449
	TENNESSEE	FT-A 201	Ellisburg 060012	Worcester 020109 (Z6)	8,433
STEUBEN	STEUBEN	STEUBEN	Steuben Storage	Steuben Sto 90005 (CNG)	11,792
	CNGT	FT 200040	Steuben Sto 90005	Morrisville 40114 (Z5)	11,792
	TENNESSEE	14688	Niagara (Z5) 010902/ Morrisville (Z5) 012065	Morrisville (CNG) 012065/ Worcester 020109 (Z6)	9,600

ALL STORAGE SHOULD BE NOMINATED 24 HOURS BEFORE GAS FLOW IS REQUIRED

Exhibit 4

WEIGHTED SUPPLIER CRITERIA

CRITERIA	PERCENT
RELIABILITY	25%
COMPETITIVENESS	25%
DIVERSITY	20%
RESPONSIVENESS	15%
FINANCIAL STRENGTH	15%
And the second s	

NSTAR Gas Company D.T.E. 02-12 Department of Telecommunications and Energy Record Request: DTE-1

Person Responsible: Mary Novak

October 16, 2002

Record Request DTE-1

Please update Tables A.6 and A.7 in the DRI-WEFA Report for the number of commercial customers in the Worcester Division and for the Total Company.

Response

Please see the attached tables.

Table A.6 Worcester Division Natural Gas Aggregate Sales Forecast

I					His	History	Forecast						Annual Growth %	rth %
	1995	1996	1997	1998	1999	2000	2001	2002	2003	2004	2005	2006	2000/95	2006/01
Customers														
Residential	66476	67,582	68,143	69,039	70,112	71,550	72,084	72,596	73,088	73,560	74,015	74,453	1.48%	0.65%
Residential-Heating	62233	63,413	64,067	64,958	65,848	67,333	67,891	68,421	68,928	69,412	69,875	70,320	1.59%	0.71%
Firm Sales	62233	63,413	64,067	64,958	65,848	67,333	67,891	68,421	68,928	69,412	69,875	70,320	1.59%	0.71%
Interruptible Sales	0	0	0	0	0	0	0	0	0	0	0	0	:	1
Firm Transportation	0	0	0	0	0	0	0	0	0	0	0	0	i	i
Interruptible Transport.	0	0	0	0	0	0	0	0	0	0	0	0	i	i
Residential-NH	4243	4,169	4,076	4,081	4,264	4,217	4,194	4,175	4,160	4,148	4,139	4.133	-0.13%	-0.29%
Firm Sales	4243	4,169	4,076	4,081	4,264	4,217	4,194	4,175	4,160	4,148	4,139	4,133	-0.13%	-0.29%
Interruptible Sales	0	0	0	0	0	0	0	0	0	0	0	0	ı	ł
Firm Transportation	0	0	0	0	0	0	0	0	0	0	0	0	ł	i
interruptible Transport.		0	0	0	0	0	0	0	0	0	0	0	I	i
Municipal	439	457	488	479	520	551	576	597	615	631	646	629	4.66%	2.72%
Firm Sales	439	457	488	477	469	486	498	506	518	531	537	549	2.07%	2.00%
Interruptible Sales	0	0	0	0	0	0	0	0	0	0	0	0	;	i
Firm Transportation	0	0	0	က	51	65	79	92	26	100	108	110	ł	6.89%
Interruptible Transport.	0	0	0	0	0	0	0	0	0	0	0	0	1	ţ
Commercial	6248	6,403	6,485	6,623	6,755	6,954	7,149	7,340	7,526	7,708	7,886	8,058	2.17%	2.42%
Firm Sales	6246	6,392	6,445	6,464	6,562	6,698	6,854	6,963	7,140	7,314	7,403	7,566	1.41%	2.00%
Interruptible Sales	0	0	0	7	5	9	ιΩ	S	വ	2	5	ß	į	%00'0
Firm Transportation	Ψ-	9	32	152	183	245	286	366	376	385	473	483	200.59%	11.08%
Interruptible Transport.		_	ı,	S	S.	2	ιΩ	5	5	5	5	ະດ	37.97%	%00'0
Industrial	462	482	502	501	494	497	200	503	505	207	209	511	1.48%	0.41%
Firm Sales	428	442	441	426	416	409	406	408	410	412	413	415	~06'0-	0.41%
Interruptible Sales	24	19	10	7	ო	5	ß	2	3	5	S	ις	-26.93%	0.00%
Firm Transportation	œ	19	48	29	69	77	83	84	84	84	82	82	57.42%	0.41%
Interruptible Transport.	2	7	က	9	ဖ	9	9	9	9	9	9	9	24.57%	%00.0
Total Customers	73625	74,924	75,618	76,643	77,803	79,553	80,310	81,036	81,733	82,407	83,055	83,681	1.56%	0.83%

Table A.6 Worcester Division Natural Gas Aggregate Sales Forecast

1					His	History Fo	Forecast						Annual Growth %	th %
<u> </u>	1995	1996	1997	1998	1999	2000	2001	2002	2003	2004	2005	2006	2000/95	2006/01
Residential Residential-Heating														
Firm Sales	119	126	122	105	111	120	119	119	118	118	117	117	0.16%	-0.32%
Interruptible Sales	0	0	0	0	0	0	0	0	0	0	0	0	} }	!
Firm Transportation	0	0	0	0	0	0	0	0	0	0	0	0	;	ŀ
Interruptible Transport.	0	0	0	0	0	0	0	0	0	0	0	0	;	ŀ
Residential-NH														
Firm Sales	21	21	20	21	22	23	23	23	22	22	22	22	2.33%	-0.11%
Interruptible Sales	0	0	0	0	0	0	0	0	0	0	0	0	: !	ŀ
Firm Transportation	0	0	0	0	0	0	0	0	0	0	0	0	i	;
Interruptible Transport.	0	0	0	0	0	0	0	0	0	0	0	0	;	ì
Municipal														
Firm Sales	1765	2,047	1,819	1,468	1,001	931	834	797	701	635	269	496	-12.01%	-9.87%
Interruptible Sales	0	0	0	0	0	0	0	0	0	0	0	0	1	;
Firm Transportation	0	0	0	3,358	7,535	8,069	7,770	7,509	7,798	8,228	8,171	8,621	;	2.10%
Interruptible Transport.	0	0	0	0	0	0	0	0	0	0	0	0	1	;
Commercial														
Firm Sales	638	675	638	497	479	510	457	420	384	347	311	272	-4.39%	-9.87%
Interruptible Sales	0	0	0	0	4,551	6,701	4,020	7,201	6,121	5,203	4,423	3,743	ł	-1.42%
Firm Transportation	11050	29,209	15,511	9,259	8,123	7,919	7,616	7,068	7,895	8,751	7,954	8,640	-6.45%	2.56%
Interruptible Transport.	139873	177,453	105,702	78,325	118,099	126,793	76,076	120,993	121,396	121,739	122,031	122,285	-1.94%	896.6
Industrial														
Firm Sales	6943	6,884	4,634	2,445	1,711	1,693	1,206	884	559	453	230	116	-24.59%	-37.35%
Interruptible Sales	4703	2,584	6,808	57,402	5,840	1,033	516	925	786	899	568	481	-26.16%	-1.42%
Firm Transportation	168939	77,277	55,758	46,991	46,221	48,147	47,622	49,657	51,845	53,047	54,907	56,257	-22.20%	3.39%
Interruptible Transport.	368830	358,734	212,090	136,554	139,836	73,237	43,942	69,887	70,120	70,318	70,487	70,634	-27.63%	9:96%
						_								

Table A.7 Total Company Natural Gas Aggregate Sales Forecast

					His	History	Forecast						Annual Growth %	#%
	1995	1996	1997	1998	1999	2000	2001	2002	2003	2004	2005	2006	2000/95	2006/01
Customers														
Residential	210069	212,395	213,809	215,772	218,228	221,503	222,989	224,418	225,800	227,138	228,436	229,696	1.07%	0.59%
Residential-Heating	180982	183,620	185,457	187,592	189,332	192,869	194,472	196,000	197,463	198,867	200,217	201,517	1.28%	0.71%
Firm Sales	180982	183,620	185,457	187,592	189,332	192,869	194,472	196,000	197,463	198,867	200,217	201,517	1.28%	0.71%
Interruptible Sales	0	0	0	0	0	0	0	0	0	0	0	0	:	}
Firm Transportation	0	0	0	0	0	0	0	0	0	0	0	0		!
Interruptible Transport.	0	0	0	0	0	0	0	0	0	0	0	0	į	i
Residential-NH	29087	28,775	28,352	28,180	28,896	28,635	28,517	28,418	28,337	28,271	28,219	28,179	-0.31%	-0.24%
Firm Sales	29087	28,775	28,352	28,180	28,896	28,635	28,517	28,418	28,337	28,271	28,219	28,179	-0.31%	-0.24%
Interruptible Sales	0	0	0	0	0	0	0	0	0	0	0	0		ì
Firm Transportation	0	0	0	0	0	0	0	0	0	0	0	0	}	ł
Interruptible Transport.	0	0	0	0	0	0	0	0	0	0	0	0	į	i
Municipal	1136	1,162	1,218	1,252	1,387	1,441	1,468	1,504	1,537	1,563	1,587	1,610	4.87%	1.86%
Firm Sales	1136	1,162	1,218	1,215	1,277	1,300	1,310	1,332	1,359	1,380	1,395	1,415	2.74%	1.56%
Interruptible Sales	0	0	0	0	0	0		0	0	0	0	0	i	i
Firm Transportation	0	0	0	37	110	140		172	178	183	192	195	i	4.28%
Interruptible Transport.	0	0	0	0	0	0		0	0	0	0	0	ì	ı
Commercial	18366	18,697	18,909	19,246	19,647	20,072		20,978	21,385	21,773	22,142	22,494	1.79%	1,83%
Firm Sales	18358	18,671	18,775	18,839	19,172	19,526		20,275	20,668	21,042	21,318	21,656	1.24%	1,68%
Interruptible Sales	0	0	0	S	14	12		=	11	-	7	7	i	%00.0
Firm Transportation	9	24	126	395	452	526		682	269	711	803	818	144.67%	6.55%
Interruptible Transport.	2	7	80	7	თ	80		10	10	10	10	10	31.95%	0.00%
industrial	891	806	949	951	936	947		955	957	959	961	962	1.22%	0.22%
Firm Sales	815	827	834	836	808	794		787	782	779	774	769	-0.52%	-0.49%
Interruptible Sales	49	40	52	4	ω	14		13	13	13	13	13	-22.16%	0.00%
Firm Transportation	15	28	75	86	106	121		139	145	150	157	163	51.72%	4.05%
Interruptible Transport.	12	13	15	13	13	18		17	17	17	17	17	8.45%	0.00%
Total Customers	230462	233,162	234,885	237,220	240,070	243,963	245,952	247,855	249,680	251,433	253,126	254,763	1.15%	0.71%

Table A.7 Total Company Natural Gas Aggregate Sales Forecast

					History		Forecast						Annual Growth %	vth %
	1995	1996	1997	1998	1999	2000	2001	2002	2003	2004	2005	2006	2000/95	2006/01
Usage														
Residential														
Residential-Heating														
Firm Sales	115	122	116	102	106	117	113	113	113	113	112	112	0.24%	-0.06%
Interruptible Sales	0	0	0	0	0	0	0	0	0	0	0	0	į	;
Firm Transportation	0	0	0	0	0	0	0	0	0	0	0	0	i	i
Interruptible Transport.	0	0	0	0	0	0	0	0	0	0	0	0	;	ł
Residential-NH														
Firm Sales	17	17	17	17	17	18	18	18	17	17	17	17	1.71%	-0.81%
Interruptible Sales	0	0	0	0	0	0	0	0	0	0	0	0	i	ì
Firm Transportation	0	0	0	0	0	0	0	0	0	0	0	0	ì	i
Interruptible Transport.	0	0	0	0	0	0	0	0	0	0	0	0	:	i
Municipal														
Firm Sales	1710	1,909	1,733	1,415	1,143	1,076	1,033	980	920	867	805	741	-8.85%	-6.44%
Interruptible Sales	0	0	0	0	0	0	0	0	0	0	0	0	i	i
Firm Transportation	0	0	0	2,876	6,733	6,886	0	0	0	0	0	0	ì	ì
Interruptible Transport.	0	0	0	0	0	0	0	0	0	0	0	0	:	į
Commercial														
Firm Sales	581	622	280	470	451	482	448	422	394	370	341	313	-3.65%	-6.94%
Interruptible Sales	0	0	0	8,697	4,518	4,776	2,605	4,667	3,967	3,372	2,866	2,425	i	-1.42%
Firm Transportation	43293	23,182	8,271	7,529	7,476	7,861	7,934	8,033	8,978	9,831	9,684	10,486	-28.91%	5.74%
Interruptible Transport.	82033	94,426	74,536	60,337	68,901	88,201	43,237	67,333	67,558	67,749	67,911	68,052	1.46%	9.50%
Industrial														
Firm Sales	5397	5,617	4,182	2,234	1,753	1,764	1,393	1,132	887	758	604	471	-20.04%	-19.49%
Interruptible Sales	13005	3,067	3,709	37,742	8,043	2,673	1,440	2,579	2,192	1,863	1,584	1,340	-27.12%	-1.42%
Firm Transportation	137535	84,487	52,184	46,462	43,645	44,010	42,136	42,867	43,224	43,485	43,350	43,276	-20.38%	0.54%
Interruptible Transport.	339305	285,870	217,284	249,353	242,094	182,913	116,813	42,616	42,763	42,888	42,995	43,087	-11.62%	-18.08%